REMARKS/ARGUMENTS

This paper is in response to the Office Action mailed on November 15, 2006. Claims 25-41 are pending in the application and are rejected, and claims 25, 32, and 37 are amended. No new matter was added to the prosecution of this application. For at least the reasons stated below, Applicants assert that all claims are in condition for allowance.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

Claims 25-26, 28-33, 35-38, and 40-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Moran* in view of *Atkins* and further in view of *Killeen*. In light of the aforementioned claim amendments and the arguments below, the cited references— each alone or in combination—do not teach or suggest all the claim limitations as required by MPEP § 2143. Therefore, this rejection is unsupported by the art and Applicants respectfully request that Examiner withdraw the § 103 rejection.

Independent Claims 25, 32, and 37

The present claimed invention generally provides a method, a system, and a computer program (claims 25, 32, and 37) for providing automated coaching for a financial modeling and counseling system over a network to a user-investor, comprising:

inputting personal financial data of the user-investor;
inputting user preferences;
inputting user financial goals;
inputting external financial market data;
processing the personal financial data, the external financial market data, the user preferences, and the user financial goals; and
outputting to the user-investor:
    (a)   automated coaching provided by an automated rules-based analysis and presented in a natural language format wherein the coaching includes financial advice based on the personal financial data, preferences, and financial goals of the user-investor;
    (b)   a proposed product configuration formulated to comply with the user preferences and the user financial goals, wherein the proposed product configuration includes recommended securities for the user-investor to purchase from a larger set of securities; and
    (c)   a projection of an effect of the proposed product configuration on attaining the user financial goals.

The independent claims recite at least three distinct components that are output to the user: (a) automated coaching, (b) a proposed product configuration, and (c) a projection. The cited references fail to teach or suggest such three distinct output components.

The *Moran* reference discloses a computer-implemented financial planning and advice system for assisting financial advisors in performing financial simulations for clients. Abstract; Col. 1, lines 13-18; Col. 2, line 62-Col. 3, line 18. To this end *Moran* describes a recommendation summary, generated in part by a financial advisor, that generally recommends investing in equity mutual funds or in particular stock market certificates and curtly mentions an "asset allocation analysis." Fig. 49; Col. 34, lines 10-24. However, nowhere does *Moran* disclose a proposed product configuration with recommended securities for a user-investor to purchase as claimed. First, the reference only describes a system providing advice to a financial advisor, not a user-investor, i.e., the individual who invests. Moreover, *Moran* merely describes the allocation of <u>assets in general</u> in a high-level discussion of an asset allocation analysis, which discusses allocating assets among various general investment categories, *e.g.*, bonds, mutual funds, stocks, cash, or real estate holdings. Nowhere does *Moran* describe outputting a product configuration to a user-investor.

Similarly, the *Atkins* and *Killeen* references also fail to teach or suggest outputting three distinct components to a user-investor, even when these references are combined with *Moran*. The *Atkins* reference discloses a financial management program, including a financial planning model that "establishes an optimal system of priorities for the allocation of the stocks (quantities) and flows of financial assets and liabilities." Col. 21, lines 12-42. However, this financial planning model only describes the general allocation of assets and liabilities, but nowhere does the reference describe outputting a product configuration as claimed. The *Killeen* reference describes a data processing system for brokerage transactions, financial services, and banking account services (see abstract), but nowhere does the reference describe outputting any of the three aforementioned components recited by the independent claims.

The cited references fail to teach or suggest all of the claim limitations as required by MPEP § 2143. For at least this reason, the 35 U.S.C. § 103 rejection fails to form a *prima facie* case of obviousness, and Applicants respectfully request removal of the rejections and allowance of the claims.

Dependent Claims 28, 35, and 40

Dependent claims 28, 35, and 40 each recite "wherein the automated coaching advice in natural language format is an interpretation of numerical data." The cited references—each alone or in combination—fail to teach or suggest this limitation.

The _Moran_ reference, which is cited as teaching this limitation, discloses a "Goal 261" for future estate planning. _See_ Fig. 35; Col. 24, line 48-Col. 26, line 42. However, the system of _Moran_ does not present natural language to a user-investor that "is an interpretation of numerical data" as claimed. The section of the reference cited by Examiner as purportedly teaching this limitation—Col. 25, lines 52-55—discusses suggesting gifting strategies, but the reference is silent on the format of such suggestions. The _Atkins_ and _Killeen_ references are also silent on the matter of presenting natural language to a user-investor that "is an interpretation of numerical data" as claimed.

The cited references fail to teach or suggest all of the claim limitations of claims 28, 35, and 40 as required by MPEP § 2143. For this additional reason, the 35 U.S.C. § 103 rejection fails to form a _prima facie_ case of obviousness as to these claims, and Applicants respectfully request removal of the rejections and allowance of the claims.

CONCLUSION

This application now stands in allowable form and reconsideration and allowance are respectfully requested.

In the event a telephone conversation would expedite the allowance of the present application, the undersigned may be reached at 612-607-7237.
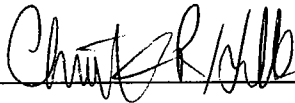
If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees including fees for any extension of time, to Deposit Account No. 50-1901 (Docket 60021-376002).

Respectfully submitted,

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